

areas of dense population. Users in rural, low population areas generally require two-way radio systems to cover a larger area than those in areas of dense population. Business, public safety*, and local government users in rural areas need systems that will cover a large geographical area with the lowest possible number of transmitters in order to make a radio system economically feasible. We would propose a stepped chart similar to that of Chart C-14 with the criteria of service area radius being replaced by some criteria of the population level within a 75 mile radius of the transmitter site. Time limits imposed by the required comment deadline prevent us from designing a complete chart, but we would propose that as a first level that areas with a population of 250,000 or less within a 75 mile radius of the transmitter site have authorized power levels of 300 watts ERP. Successive table elements would consider areas of increasing population and antenna height until the more restrictive levels found in the current C-3 chart are reached in areas of high density population.

2. Regarding the General Category Pool and the proposal that all certified frequency coordinators be allowed to assign frequencies from this pool, we also have some reservations. If all coordinators are to be allowed to assign frequencies, a single, common and up-to-date database must be maintained for use by all coordinators. Multiple databases cannot be allowed. Allowing multiple databases to be maintained by various coordinators would cause continuous and harmful interference on the single designated contractor. The database requirements for this type of system will be quite enormous and the criteria for selecting a possible contractor will have to be carefully reviewed to ensure that the database is kept current, accurate and is available full time for access by the various coordinators.

An alternate solution may be to divide the United States into various 'coordination zones' with a single coordinator for each zone. This would reduce the database requirements for each system to a more manageable level. The coordinators would need to have cooperative arrangements for systems that would overlap zone boundaries similar to the arrangements now in place for inter-service sharing and adjacent channel authorizations.

3. The narrower bandwidth required by the proposed rules to create additional channels is for the most part a viable solution for the congestion now found on the current radio frequencies. However, we submit that a more gradual and extended phase-in period be implemented to reduce the economical impact on business, local government, and public safety users. The longer phase-in period would also allow for further research and development time by equipment manufacturers to address adequately all technical issues and requirements of the new specifications and to develop reliable, economic equipment.

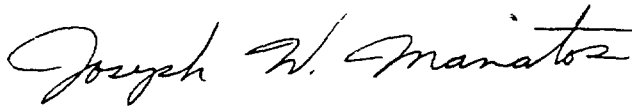
4. Finally, we ask that the period for comments on the proposed rule-making be extended until July 30, 1993 in order to more fully evaluate the impact of the proposed changes and to make further recommendations to the Commission. We feel that field testing on existing systems of the new narrower bandwidth and reduced power levels are very much in order. In many parts of the country, winter weather conditions prevent or severely curtail

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the feasibility of performing such tests. We ask for the extension of the comment period to allow for the system testing when weather conditions permit technical personnel easy access to transmitter sites to adjust existing systems for the new specifications and perform coverage tests during periods that will have a less serious effect on radio systems, businesses, and public safety operations. To perform such tests during the winter months would be difficult technically and could have a serious impact on the safety of property and lives.

Respectfully submitted,

JOHNSON-FERMELIA CO., INC.



Joseph W. Manatos, PLS
Principal/Director of Surveying

cc: Mr. Ralph A. Haller
Chief, Private Radio Bureau
Federal Communications Commission
Washington DC 20554

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261 Dirksen Building
Washington DC 20510

Senator Malcolm Wallop
United States Senate
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Custom Electronics
8870 Hamilton St.
Alta Loma, CA 91701

Futaba Corp. of America
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Hobby Shack
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Sagle, ID 83860

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RADIO CONTROL MANUFACTURER'S ASSOCIATION

RECEIVED

MAR - 8 1993

YOUR R/C HOBBY IS IN JEOPARDY!

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Recently, the Hobby Industry and the modeling public was notified of a proposal concerning a major change in the allocation of frequencies by the FCC including those used by the R/C modeler. The areas affected include both 72 MHz and 75 MHz bands.

The proposal includes the insertion of multiple frequencies between the existing already shared hobby frequencies, resulting in unusable areas of the band due to huge safety problems and the accompanying liability potential plus undue costs that are created by the obsolescence of all existing R/C equipment and very high replacement costs of new equipment that would be able to operate in the new environment.

It is the opinion of R/CMA that a vigorous protest must be filed with the FCC at all levels including a massive letter writing campaign. The FCC has given all interested parties until **February 26th, 1993** to respond to them and interested legislative members who might influence the decision. After that date it will fall on deaf ears. Do not let this become LAW. **WRITE YOUR LETTER TODAY** and encourage your business associates and modeling friends to do the same.

Refer to **NPRM PR Docket 92-235** and address your concerns of safety, the economic impact on you, and the very survival of the R/C hobby. FCC's address is listed below, so please respond by personal letter as FCC does not recognize petitions or form letters.

FEDERAL COMMUNICATIONS COMMISSION
1919 M St. N.W.
Washington, D.C. 20554

P.B.
(u)



THE STATE OF WYOMING

MIKE SULLIVAN
GOVERNOR

1993 FEB 12
RECEIVED
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STATE ENGINEER

State Engineer's Office

HERSCHLER BUILDING, 4-E
(307) 777-7354

February 12, 1993

CHEYENNE, WYOMING 82002-0370

FAX (307) 777-5451

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

RECEIVED

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

MAR - 8 1993

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

RE: PR Docket No. 92-235

Dear Ms. Searcy:

The following are my comments in reference to PR Docket No. 92-235.

1. By its very nature, PR Docket No. 92-235 will require a full radio system change out. It does not provide for a graceful migration path. To my agency of State government alone it will require funding in excess of \$40,000 to replace the mobile and base units.

2. There is no interoperability between the new and old systems, or between the new Part 88 VHF 5 kHz equipment and Federal 6.25 kHz equipment.

3. Technical issues:

a. Immediate reduction to 3 kHz deviation will result in a range reduction of 40% plus problems generating sufficient audio output power especially in high noise areas (heavy equipment, etc.). Additionally, reduced deviation will cause CICS and pager decoder failure. This means unreliable system performance.

b. Reduced transmitter power will result in reduced coverage. In many cases, reducing power to new Part 88 will cause serious emissions from power amplifiers.

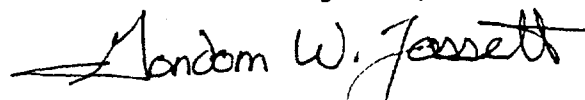
The Commission needs to give some serious consideration to not implement these regulations in sparsely populated states like Wyoming who in these economic times can ill afford any additional expenditures at the State or County level to provide needless changes to an adequate radio system.

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
February 12, 1993
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My statewide network of water right administration, dam safety and canal safety staff depends daily on the use of the radio network provided by the State of Wyoming. This is not the time for the FCC to impact limited funding opportunities and our efficiency by reducing our communication capabilities.

Thank you for your consideration.

With best regards,


GORDON W. FASSETT
State Engineer

GWF/ckr

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\ Mr. Alan K. Simpson
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Mr. Craig Thomas
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